

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

IN THE MATTER OF:

REAGOR-DYKES MOTORS, LP
REAGOR-DYKES IMPORTS, LP
REAGOR-DYKES AMARILLO, LP
REAGOR-DYKES AUTO COMPANY, LP
REAGOR-DYKES PLAINVIEW, LP
REAGOR-DYKES FLOYDADA, LP

CASE NO. 18-50214
CASE NO. 18-50215
CASE NO. 18-50216
CASE NO. 18-50217
CASE NO. 18-50218
CASE NO. 18-50219

DEBTOR

CHAPTER 11

MOTION OF MIDLAND CENTRAL APPRAISAL DISTRICT AND FLOYD CENTRAL APPRAISAL
DISTRICT TO INTERVENE IN THE MOTION FOR RELIEF FROM STAY BY FORD MOTOR
CREDIT COMPANY LLC

TO THE HONORABLE BANKRUPTCY JUDGE:

AN ORDER WILL BE ENTERED GRANTING THE RELIEF REQUESTED HEREIN WITHOUT FURTHER HEARING UNLESS A WRITTEN OBJECTION AND REQUEST FOR HEARING IS FILED WITH THE CLERK WITHIN TWENTY ONE (21) DAYS OF THE DATE OF ISSUANCE OF THIS NOTICE. ANY SUCH OBJECTION MUST ALSO BE SERVED UPON THE MOVING PARTY AND UPON ALL OTHER PERSONS INDICATED ON THE CERTIFICATE OF SERVICE ATTACHED TO THIS PLEADING.

NOW COMES the Midland Central Appraisal District and Floyd Central Appraisal District, files its Motion To Intervene In the Motion For Relief From Automatic Stay By Ford Motor Credit Company LLC (“Motion”) and would show the court the following:

1. The Midland Central Appraisal District and Floyd Central Appraisal District are political subdivisions of the State of Texas
2. There are property taxes for 2017 and 2018 due in the total amount of \$143,649.44 on the Debtor’s property described as Vehicle Inventory used in the operation of Regor Dykes, Inc. and associated cases. The property taxes for 2017 are due in the amount of \$37,704.91. The estimated taxes for 2018 are due in

the amount of \$105,944.53. The 2018 estimated taxes are based upon the base taxes assessed for 2017 and final assessment of these taxes will occur later in 2018. These property taxes are liquidated secured claim against the Debtor's property and are entitled to priority over other secured claims under 11 U.S.C. § 506.

3. The laws of the State of Texas, Property Tax Code, Section 32.05(b), give the tax lien represented by the delinquent property taxes priority over the lien of any other claim or lien against this property.

4. The Midland Central Appraisal District and Floyd Central Appraisal District has a statutory security interest in the property which is the subject of Manheim.

5. WHEREFORE, the Midland Central Appraisal District and Floyd Central Appraisal District, prays that the Court order the automatic stay be modified at the same time and to the same extent, and under the same terms for Midland Central Appraisal District and Floyd Central Appraisal District, as for the original movant Ford Motor Credit Company LLC and for other and such relief as is just and proper. The Midland Central Appraisal District and Floyd Central Appraisal District further prays that the Court order Ford Motor Credit Company LLC to immediately notify Midland Central Appraisal District and Floyd Central Appraisal District through the undersigned in the event Ford Motor Credit Company LLC takes possession of its collateral that is the subject of its Motion, and for other and such relief is just and proper.

Dated: August 15, 2018

Respectfully submitted,
McCREARY, VESELKA, BRAGG & ALLEN, P.C.
P.O. Box 1269
Round Rock, TX 78680
(512) 323-3200
(512) 323-3205 (FAX)

/s/ Tara LeDay

Tara LeDay
State Bar No. 24106701

ATTORNEY FOR MIDLAND CENTRAL
APPRAISAL DISTRICT AND FLOYD CENTRAL
APPRAISAL DISTRICT

CERTIFICATE OF SERVICE

I hereby certify that the above Motion to Intervene has been served upon the following parties as well as all parties receiving the Court's ECF service on August 15, 2018, by Electronic Notification.

/s/ Tara LeDay

Tara LeDay

David R Langston and Brad W Odell
Mullin Hoard & Brown, LLP
PO Box 2585
Lubbock, TX 79408-2585

US Trustee's Office
1100 Commerce St Room 9C60
Dallas, TX 75242

Reagor-Dykes Amarillo, LP
1215 Ave. J
Lubbock, TX 79401-4019

Reagor-Dykes Auto Company, LP
1215 Ave. J
Lubbock, TX 79401-4019

Reagor-Dykes Floydada, LP
1215 Ave. J
Lubbock, TX 79401-4019

Reagor-Dykes Imports, LP
1215 Ave. J
Lubbock, TX 79401-4019

Reagor-Dykes Motors, LP
1215 Ave. J
Lubbock, TX 79401-4019

Reagor-Dykes Plainview, LP
1215 Ave. J
Lubbock, TX 79401-4019

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

IN THE MATTER OF:

REAGOR-DYKES MOTORS, LP
REAGOR-DYKES IMPORTS, LP
REAGOR-DYKES AMARILLO, LP
REAGOR-DYKES AUTO COMPANY, LP
REAGOR-DYKES PLAINVIEW, LP
REAGOR-DYKES FLOYDADA, LP

CASE NO. 18-50214
CASE NO. 18-50215
CASE NO. 18-50216
CASE NO. 18-50217
CASE NO. 18-50218
CASE NO. 18-50219

DEBTOR

CHAPTER 11

ORDER ON
GRANTING MIDLAND CENTRAL APPRAISAL DISTRICT AND FLOYD CENTRAL APPRAISAL
DISTRICT LEAVE TO INTERVENE

Upon consideration of the motion of Midland Central Appraisal District and Floyd Central Appraisal District for leave to intervene in Ford Motor Credit Company LLC Motion for Relief From Automatic Stay filed in this case, the court finds such motion should be granted.

THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED that Midland Central Appraisal District and Floyd Central Appraisal District (Intervenors) are allowed to intervene in the Motion For Relief From Automatic Stay filed by Ford Motor Credit Company LLC in this case. The stay is lifted as to the Intervenor to the same extent, with regard to the same property and under the same terms as the stay is lifted as to Ford Motor Credit Company LLC.

IT IS FURTHER ORDERED that if the stay is terminated and Ford Motor Credit Company LLC takes possession of the collateral that is the subject of its Motion, Ford Motor Credit Company LLC shall immediately notify, in writing, Midland Central Appraisal District and Floyd Central Appraisal District, by and through their attorney of record, that it has taken possession of any property subject to this motion to lift stay.

#